

#### REMARKS

Applicant respectfully requests favorable reconsideration of this application, as amended.

The claims have been editorially revised for clarity and better conformity with U.S. practice.

The Examiner's indication of allowable subject matter in 3 and 8-10 is acknowledged with appreciation. These claims have been retained in dependent form in view of the allowability of independent Claim 1, as discussed below.

Claim 1 was rejected under 35 U.S.C. § 102(b) as being anticipated by Hirakawa (5,724,193). The rejection is respectfully traversed.

In accordance with Applicant's invention as set forth in Claim 1, a fisheye lens system comprises a first lens group having negative refractive power disposed most to an object side, and a second lens group having positive refractive power disposed to an image side of the first lens group. A distance between the first lens group and the second lens group is variable, with the fisheye lens system taking maximum focal length state when the distance is minimum, and a minimum focal length state when the distance is maximum. A maximum image height in the maximum focal length state is different from that in the minimum focal length state, and in each focal length state the fisheye lens system has an angle of view of 170 degrees or more.

With respect to the last-mentioned feature concerning angle of view, the rejection asserts that Hirakawa teaches an angle of view greater than 160 degrees. However, Claim 1 explicitly recites an angle of view of 170 degrees or more. The rejection of Claim 1 is therefore unsupported by the asserted teaching of the reference. Moreover, as will be appreciated from the following table summarizing relevant data for Hirakawa's examples (embodiments 1-6), none of Hirakawa's examples meets the claimed feature that in each focal length state the fisheye lens system has an angle of view of 170 degrees or more.

HIRAKAWA EMBODIMENTS 1-6

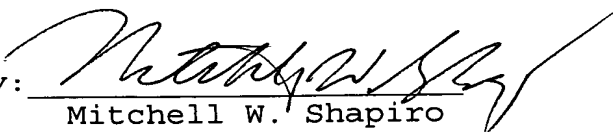
|              | f<br>(focal length) | W<br>(half angle of view) | 2W<br>(angle of view) |
|--------------|---------------------|---------------------------|-----------------------|
| Embodiment 1 | 16.79-20.64-27.00   | 85-62-46°                 | 170-124-92°           |
| Embodiment 2 | 16.78-20.64-27.00   | 85-62-46°                 | 170-124-92°           |
| Embodiment 3 | 16.79-20.64-27.00   | 85-62-46°                 | 170-124-92°           |
| Embodiment 4 | 16.18-20.64-27.00   | 93.4-62.7-46.1°           | 186.8-125.4-92.2°     |
| Embodiment 5 | 19.90-35.00-46.00   | 81.2-36.4-27.2°           | 162.4-72.8-54.4°      |
| Embodiment 6 | 3.33-4.50-5.40      | 83-48-38°                 | 166-96-76°            |

Accordingly, it is respectfully urged that the outstanding rejection be withdrawn and that this application now be passed to issue.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 any fees under 37 C.F.R. §§ 1.16 and 1.17 which may be required by this paper, and to credit any overpayment to that Account. If any extension of time

is required in connection with the filing of this paper and has not been requested separately, then such extension is hereby requested.

Respectfully submitted,

By:   
Mitchell W. Shapiro  
Reg. No. 31,568

MWS:ms

Miles & Stockbridge P.C.  
1751 Pinnacle Drive  
Suite 500  
McLean, Virginia 22102-3833  
(703) 903-9000

June 27, 2005